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By ECF

**APPLICATION GRANTED
SO ORDERED** 
VERNON S. BRODERICK
U.S.D.J. 7/3/2018

Honorable Vernon S. Broderick
United States District Judge
United States Courthouse
40 Foley Square
New York, NY 10007

Re: United States v. Ng Lap Seng, S5 15 Cr. 706 (VSB)

Dear Judge Broderick:

Pursuant to the Court's August 7, 2017 Order, we write on behalf of Mr. Ng Lap Seng to seek approval for Mr. Ng to visit Dr. Jaydeep Bhatt at 221 East 41st Street, 9th Floor, New York, 10017. This visit will provide important consultation as to Mr. Ng's recent recurrent and unpredictable headaches. More importantly, Mr. Ng will be able to send the doctor any test results and communicate with the doctor over the phone in the future after establishing the patient profile.

Under the revised bail order, the defendant has sought the Government's approval for these visits. The Government has consented subject to the following conditions, which Mr. Ng accepts and Guidepost confirms will be met:

1. Neither the defendant nor any family member, friend, or business associate has a pre-existing business or personal relationship with the medical personnel that the defendant wishes to visit.
2. The defendant agrees that the Government and/or an independent doctor or doctors, of the Government's choosing, may speak with:
 - a) all medical personnel at Elitra Health Center with whom the defendant interacted, and all medical personnel who administered the tests he received or authored the report that was sent to the Government;
 - b) all medical personnel at NYU Langone, or any other medical facility that the defendant may visit in the future, and

KIRKLAND & ELLIS LLP

Honorable Vernon S. Broderick

July 2, 2018

Page 2

- c) the defendant agrees to execute a HIPPA waiver, if necessary, to facilitate such conversations.
- 3. The defendant agrees that all records the Government have received to date, and all records the Government will receive in the future, may be shared with:
 - a) an independent doctor or doctors, of the Government's choosing;
 - b) the Court; and
 - c) the Federal Bureau of Prisons.
- 4. The GPS bracelet shall remain on at all times, and no medical test or procedure shall be performed that would require its removal or that it be turned off or altered or blocked in any way.
- 5. The security arrangements provided by Guidepost with respect to the Elitra Health Center apply to these visits.
- 6. The defendant's daughter-in-law is also to be searched before and after the visits.
- 7. Other than the defendant's daughter-in-law, no other family member, friend, or business associate shall accompany the defendant.
- 8. An agent, of the Government's choosing, at the Government's discretion, and without notice to the defendant, may be present for all travel, and the visits themselves.
- 9. The visits must be completed during the hours cleared by Pretrial Services.
- 10. Guidepost must promptly inform the Government, not just Pretrial Services, of any deviation from the security plan, the timing of visits, the timing of the defendant's return to his apartment, or any attempt by the defendant or his daughter-in-law to violate any condition of bail pending surrender, including but not limited to any attempt by the defendant to use a cellphone or interact with non-medical personnel.

Accordingly, we respectfully request the Court's approval for Mr. Ng to visit Dr. Jaydeep Bhatt at 221 East 41st Street, 9th Floor, New York, NY 10017 tomorrow, July 3, 2018 at 3:45 pm. Mr. Ng's daughter-in-law, Ms. Yuan Sun, will accompany Mr. Ng to these appointments.

KIRKLAND & ELLIS LLP

Honorable Vernon S. Broderick
July 2, 2018
Page 3

We appreciate the Court's consideration of this request.

Respectfully Submitted,

KIRKLAND & ELLIS LLP

By: /s George N. Bauer
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New York, NY 10022

cc: Counsel of Record (by ECF)

SO ORDERED

Hon. Vernon S. Broderick
United States District Court
Southern District of New York